

1 **RAMZY PAUL LADAH**
2 Nevada Bar No. 11405
3 **LADAH LAW FIRM**
4 517 S. Third Street
5 Las Vegas, NV 89101
6 T: 702.252.0055
7 *Attorneys for Plaintiff*

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 LAURA PETERS,

13 CASE NO.: 2:19-cv-00874-GMN-GWF

14 vs.
15 Plaintiff,

16 SWIFT TRANSPORTATION CO. OF
17 ARIZONA, LLC; DOE DRIVER; DOES I
18 through X; XYZ CORPORATIONS XI
19 through XX; and ABC LIMITED
20 LIABILITY COMPANIES XXI through
21 XXX, inclusive,

22 **Stipulation and Order Extending Deadline to**
23 **Respond to Defendant's Motion to Compel**
24 **Deposition Testimony of Plaintiff (ECF 43)**
25 **(Second Request)**

26 Defendant(s).

27 Plaintiff, LAURA PETERS (“Plaintiff”), and Defendant, SWIFT TRANSPORTATION CO.
28 OF ARIZONA, LLC (“Defendant”), by and through their respective, undersigned counsel of
record, hereby stipulate and agree to extend the deadline for Plaintiff to respond to Defendant’s
Motion to Compel Deposition Testimony of Plaintiff (ECF No. 43) from Friday, April 9, 2021, to
Friday, April 16, 2021. The Motion was filed on March 23, 2021. This is the second stipulation for
an extension of time to respond to the Motion.

29 The parties respectfully submit that this extension is appropriate, and necessary, to
30 accommodate party counsel’s ongoing, good-faith efforts to resolve the issues raised in Defendant’s
31 aforesaid motion by way of stipulation. The short extension of time sought herein affords the parties
32



1 further time and opportunity to work toward their mutual goals of advancing discovery and
2 avoiding judicial intervention.

3 The parties aver this stipulation is not being submitted for reasons of delay or for any other
4 untoward purpose.

5 DATED this 9th day of April 2021.

6 **LADAH LAW FIRM**

7 */s/ Ramzy Paul Lada*

8 **RAMZY PAUL LADAH, ESQ.**

9 Nevada Bar No. 11405
10 517 S. Third Street
11 Las Vegas, NV 89101
12 Attorney for Plaintiff

5 DATED this 9th day of April 2021.

6 **WEINBERG WHEELER HEDGINS GUNN
& DIAL**

7 */s/ Jonathan J. Winn*

8 **JONATHAN J. WINN, ESQ.**

9 Nevada Bar No. 12896
10 6385 South Rainbow Blvd., Suite 400
11 Las Vegas, NV 89118
12 Attorneys for Defendants



Peters v. Swift Transportation Co. of Arizona, LLC
2:19-cv-00874-GMN-EJY

ORDER

Pursuant to the foregoing stipulation, by and between the parties and their respective counsel, and for good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for Plaintiff to respond to Defendant's Motion to Compel Deposition Testimony of Plaintiff (ECF No. 43), currently scheduled for Friday, April 9, 2021, shall be extended to Friday, April 16, 2021.

DATED this 12th day of April 2021.

Elayna J. Zouchal
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:
LADAH LAW FIRM

/s/ Ramzy Paul Lada

RAMZY PAUL LADAH, ESQ.

Nevada Bar No. 11405

517 S. Third Street

Las Vegas, NV 89101

Attorneys for Plaintiff Laura Peters

